

Form G-3 (20230922)

UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION DIVISION

In re: Rashonda McClellan ) Chapter 7  
                                  )  
                                  )  
                                  ) No. 23-11197  
                                  )  
Debtor(s)                  ) Judge David D. Cleary

**NOTICE OF MOTION**

TO: See attached list

PLEASE TAKE NOTICE that on November 15, 2023, at 10:00 a.m. , I will appear before the Honorable David D. Cleary, or any judge sitting in that judge's place, either in courtroom 644 of the Everett McKinley Dirksen United States Courthouse , 219 S. Dearborn Street, Chicago, IL 60604 or electronically as described below, and present the motion of Debtor [to/for] Convert Case to Chapter 13 , a copy of which is attached.

**Important: Only parties and their counsel may appear for presentment of the motion electronically using Zoom for Government. All others must appear in person.**

**To appear by Zoom using the internet**, go to this link: <https://www.zoomgov.com/>. Then enter the meeting ID and passcode.

**To appear by Zoom using a telephone**, call Zoom for Government at 1-669-254-5252 or 1-646-828-7666. Then enter the meeting ID and passcode.

**Meeting ID and passcode.** The meeting ID for this hearing is 161 122 6457, and the passcode is Cleary644. The meeting ID and passcode can also be found on the judge's page on the court's web site.

**If you object to this motion** and want it called on the presentment date above, you must file a Notice of Objection no later than two (2) business days before that date. If a Notice of Objection is timely filed, the motion will be called on the presentment date. If no Notice of Objection is timely filed, the court may grant the motion in advance without calling it.

By: /s/ David Freydin

Attorney for Debtor  
Law Offices of David Freydin  
8707 Skokie Blvd, Suite 312  
Skokie, IL 60077  
847.972.6157

**CERTIFICATE OF SERVICE**

I, David Freydin, certify [if an attorney]/declare under penalty of perjury under the laws of the United States of America [if a non-attorney] that I served a copy of this notice and the attached motion on each entity shown on the attached list at the address shown and by the method indicated on the list on November 7, 2023, at 5:00 pm.

/s/ David Freydin

[Signature]

U.S. Bankruptcy Court

Ally Bank

City of Chicago Water Dept

Eastern Division

AIS Portfolio Services, LLC

1000 East Ohio St

219 S Dearborn

4515 N Santa Fe Ave. Dept. APS

Chicago IL 60611-3416

7th Floor

Oklahoma City, OK 73118-7901

Chicago, IL 60604-1702

Consumer Adjustment

First Premier

Indigo Celic Bank

500 NW Plz

PO Box 1348

PO Box 4477

SI Ann MO 63074-2218

Sioux Falls SD 57101-1348

Beaverton OR 97076-4401

Mercedes Finance

Mercedes-Benz Financial Services USA LLC

Michael C Kim and Assoc

PO Box 685

c/o Bk Servicing, LLC

19 S Lasalle Ste 303

Roanoke TX 76262-0685

PO Box 131265

Chicago IL 60603-1245

Roseville, MN 55113-0011

Quantum3 Group LLC as agent for

Quantum3 Group LLC as agent for

Quantum3 Group LLC as agent for

Concora Credit Inc.

Genesis FS Card Services Inc

Sadino Funding LLC

PO Box 788

PO Box 788

PO Box 788

Kirkland, WA 98083-0788

Kirkland, WA 98083-0788

Kirkland, WA 98083-0788

TBOM Milestone

THD Home Depot

Ariane Holtschlag, trustee

PO Box 84059

PO Box 9001010

FactorLaw

Columbus GA 31908-4059

Louisville KY 40290-1010

105 W. Madison

Brian P Deshur

David Freydin

Suite 1500

Law Offices of David Freydin Ltd

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Patrick S Layng

8707 Skokie Blvd

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Office of the U.S. Trustee, Region 11

Suite 312

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219 S Dearborn St

Skokie, IL 60077-2281

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Room 873

Rashonda McClellan

Chicago, IL 60604-2027

18555 Country LN

Lansing, IL 60438-2582

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(u)AmeriHome Mortgage Company, LLC

(u)Mercedes-Benz Financial Services USA LLC

(u)NATIONSTAR MORTGAGE LLC



**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS**

**In the Matter of:**

Rashonda McClellan

**Debtor(s)**

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Case No. 23-11197

Chapter 7

Judge David D. Cleary

**DEBTOR'S MOTION TO CONVERT CASE TO CHAPTER 13**

NOW COMES the Debtor, Rashonda McClellan, by and through her attorney, David Freydin, and in support of their Motion to Convert to Chapter 13, state as follows:

1. On August 25, 2023, the Debtor filed a chapter 7 bankruptcy petition in the Northern District of Illinois, Eastern Division as case number 23-11197.
2. This case was assigned to Trustee Ariane Holtschlag.
3. Debtor is able to fund a Chapter 13 plan because Debtor now has a full-time position.
4. Undersigned counsel has served this motion on all parties and asks that this Honorable Court enter an order converting this case to a chapter 13.

WHEREFORE, the Debtor respectfully requests that this Honorable Court enter an order converting this case to chapter 13 and grant such other and further relief as it deems fair and just.

Respectfully Submitted,

/s/ David Freydin

David Freydin

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8707 Skokie Blvd, Suite 312  
Skokie, IL 60077  
847.972.6157